## Kurland & Associates, P.C.

YETTA G. KURLAND
GINA M. BONICA

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: \$\[ 8 \] 0 \]

304 PARK AVENUE SOUTH, SUITE 206
NEW YORK, NEW YORK 10010
TEL 212-253-6911
FAX 212-614-2532

August 2, 2007

## Via Federal Express Mail

Honorable Kenneth M. Karas United States District Court Southern District of New York 500 Pearl Street, Room 920 New York, NY 10007

Re: Alexander Dunlop v. The City of New York et al., 06-cv-433 (KMK) (JCF)

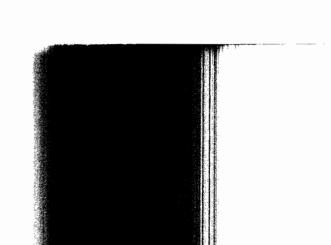
Dear Honorable Karas,

This office represents the Plaintiff, Alexander Dunlop in the above referenced matter. We respectfully inform Your Honor that we intend to take the deposition of Ms. Williams at our offices, located at 304 Park Avenue South, Suite 206, New York, NY 10010 on August 10, 2007 at 11:00 AM.

Ms. William's name was provided by Michael Morgan, Esq., counsel for Defendants, District Attorney Robert Morganthau, and Assistant District Attorney Willa Concannon, pursuant to a joint stipulation dated June 5, 2007 in which Ms. Williams was identified as one of the "John Roes" listed as a Defendant in this matter.

It is imperative that we depose Ms. Williams as soon as possible, as well as any additional parties who may be substituted as "John Does" and "John Roes" as our statutory opportunity to do so will expire August 27, 2007.

In addition, as Your Honor is aware, Defendant's Motion to Dismiss Plaintiff's Conspiracy claims is currently pending before Your Honor. As we are anticipating that Your Honor will not have ruled on this motion by August 27, 2007, the statutory time for Plaintiff to name the unnamed defendants, we respectfully request that Your Honor grant an enlargement of the time which Your Honor has full authority to do, without motion as permitted by Fed. R. Civ. P 6(b). This enlargement will allow Plaintiff to take the necessary steps to substitute any named defendants for the current "John Does" and "John Roes."



Thank you in advance for Your consideration.

Respectfully submitted,

James Mirro, Esq. cc: Michael Morgan, Esq. (Via Facsimile)

Defendants are to repond to this Cuter by August 9, 2007.

50 Ordered.

M. A. 8/6/07